Common Questions and Answers
Interagency Loan File Format
Regloans.txt

How should we name this file?

One of the problems for us with Alert files was that most vendors had a different name for the file. In addition, vendors with multiple lines sometimes had different names under each product line. Many times bank management was not aware of the correct file to request, and ended up obtaining the wrong file in preparation for the examination. That usually resulted in a delay while the correct file was identified and obtained.

For that reason, we would like the name of the file to be in the form NNNN YYYYMMDD Regloans.TXT, where NNNN indicates a shortened name of the institution and YYYYMMDD indicates the as of date of the loan data in the file. Regloans should always complete the file name and the file extension should always be TXT. There should be a space between NNNN and YYYYMMDD and another space between YYYYMMDD and Regloans. Example: Baker National 20020331 Regloans.txt

If your system won't support long names and you are limited by the DOS naming restrictions, you should call the file "reglnsX.txt", where "X" is the file sequence number. In other words, if it takes five diskettes to transfer the file, the first would be "reglns1.txt", the second "reglns2.txt", and so on.

What if the file won't fit on one disk/CD?

If the file is too large to place on one media and has to be split among more than one media, place a number indicating the sequence of the media immediately after Regloans. Example: Baker National 20020331 Regloans1.txt and Baker National 20020331 Regloans2.txt.

If we split the file, what should we report on the record count field in the header?

If the file is split across separate media, the record count should only reference the number of records on that particular media. In other words, each media on which the split file resides will have its own, specific, record count figure.

Please note, the total record count on each file does not include the header record count. Also, it's important that this record is numeric since we'll be using it to crosscheck our data.

Once a test file has been reviewed by the FDIC or the OCC can we assume that we have met the file standard?

The OCC and FDIC reviews the test files only for conformance to the standards established for each field in the file format. Since we many times receive files containing test data, the review cannot determine if the test file contains accurate or appropriate data, nor do we offer any guarantees regarding the comprehensiveness of our review. Once we begin to work with these files in onsite examinations, there may be additional issues surrounding the data. We'll be sure to work with you if this situation occurs.

How will requests for this file originate, i.e., the agency, the bank, both?

Since this will be a tool primarily for use by the field examiners, we anticipate that the requests will come to the bank as part of the normal request that precedes each examination.

Will the date of the information being requested be a current date (date of receipt of notice), future date (specified by agency/bank), or past date?

Usually, the examiner will request loan information as of a recent date. Many times this will be the previous month end.

Who should the file be sent to, i.e., agency if they make the request, bank if they make the request, both?

As noted above, we will almost always be requesting this file from the bank. In those cases, send the file to the bank so that they may combine it with the other information they are gathering in preparation for the examination.

If the potential exists for this file to be used by the OCC, FDIC, Federal Reserve and State Banking supervisors, will we be provided with all the FTP's?

While there has been a fair amount of discussion within the agencies about establishing secure web sites to gather and disseminate information, we're not to that point yet. When that occurs, we'll be in contact with the necessary technical specifications.

Who will be responsible for updating us in the event there are changes?

Since this is an interagency standard, we will keep you apprised as to who your contact person will be. For the moment, that is Dave Baker with the OCC. However, that could change as turnover occurs, or roles change within the agencies.

The FDIC certificate number and the charter number are not housed on our system; how would you like this addressed?

If you don't have the information, enter "data not available" (without the quotations) followed by a carriage-return line-feed sequence (CRLF). The first 6 rows are *not* fixed width. They are meant to be referenced by humans (visually), so they just need to be terminated with a CRLF. The fixed-width loan data may not start before row 7.

Are fields 1 through 82 considered one row and terminated by 1 carriage-return line-feed sequence?

Yes.

Will fields 1 through 82 comprise one loan detail record?

Yes.

Should we include home equity loans in the file?

The file should contain all the bank's loans regardless of type. This would include commercial as well as consumer loans.

Should we include zero-balance loans?

That depends upon the loan. We do want to see open lines of credit where the bank is obligated to advance funds in the future. These might show zero for an outstanding balance (field 22), but would show the full amount of the commitment in field 23 (undisbursed commitment availability). Examples of these types of loans that might be carrying a zero balance would credit card lines, commercial lines of credit, standby lines of credit and home equity lines. On the other hand, we do not want to see a zero-balance loan record that's simply an artifact from a loan that's been paid in full. If these were included in the file, they would show zero for both fields since there is no longer a legal obligation on the bank's part to re-advance funds.

Field 44 is titled, "charge off amount." Do you want all old charged off loans in the interagency file?

If a loan has been charged off in full, it's a zero-balance loan as described in the answer above and it should not be in the file. We have seen some files where these loans show a balance in field 22 (balance outstanding) and a like number in field 44 (charge off amount). That creates a lot of problems since at first glance these appear to be active loans. It's important to understand that the regulators will want to try to reconcile this trial balance to the amount shown for loans on the bank's general ledger using the total from field 22. Any loan that is listed in the file that isn't an active and current relationship that's properly carried as an asset of the bank should not be showing a current

balance other than zero. In addition to inhibiting our ability to balance the ledger, these lines will distort the past due and summary reports built into our tools.

If the bank has a note with a *partial* charge off, the current balance **net** of the charge off would show up in field 22 since that portion of the note is still active. The charge off amount would be listed in the "charge off" column. If you have already mapped and distributed the format to your customers and you have old charge offs in the file, no change is needed as long as the amount in "balance outstanding" for these notes is zero. We'll work around the inactive notes in those cases.

In those instances where the bank sells a portion of a note, should we report the balance in field 22 (balance outstanding) net of the sold amount?

Since we're interested in balancing field 22 to the bank's general ledger, it should be net of any amount sold. For example, if a bank makes a loan for 100,000 and then sells 25,000 to another institution, the record for that note should reflect the following subsequent to the sale:

Field 22 (balance outstanding)   75000.00
Field 56 (participation indicator)   S
Field 57 (amount sold)   25000.00
Field 58 (original amount sold)   25000.00

Please note field 57 will decrease as payments are made to the participating bank(s).

If your system is incapable of linking the participation to an individual note, then you could report the amount sold as a negative note. In the example above, the amount in field 22 for the original note would be 100000.00, and the amount in field 22 for the "participation" note would be –25000.00. Field 56 would read "S" for the negative note. In addition, you would need to populate the record for the negative note with some key information so that we could tie it to the underlying borrower. This would include:

Note number (this could be a dummy number, or a number tied to the participation)
Borrower ID
Short Name
Long Name
Address
City
State
Zip Code

Please do not populate other fields if you use the negative-note option.

Fields #33 thru 35 relate to interest rate, index and margin; our loan products can have up to 10 rates, indices and margins. How do you want to address this on the file?

We envision that this file will be presenting information on a loan-by-loan basis (i.e., one loan per line). That being the case, we would like to see the information/indices related to each loan. While we understand there could be many indices in use, we don't expect that more than one will apply to an individual note. However, if there are situations where multiple indices apply to the same note (for example, different margins for different balances), then indicate "multiple" on line 34.

Please give further definition of field #68.

We're looking to see if amortization has been suspended. This would be most common on consumer loans where there has been an agreement by the bank to suspend principle payments for specified period of time.

Twenty fields on the file format document have been identified so far as unavailable or null for our system, and they are not identified as required fields for population. Do you have any tolerance for the number of fields that are not populated on the file?

You must provide data in the handful of fields that are marked as mandatory. In all other cases, please provide us with information wherever there is matching information in your system. If you have data that is not an exact match, please contact us so that we may determine if you should map it. There is no upper tolerance for the number of blank fields if your system does not contain the information. However, that does not include the information that you might need to convert to match the format. For instance, if your system uses a formula to calculate past due status, and we have asked for past due to reported as a specific number of days, then we need you to translate your system values into data that matches our file format.

Is the file to be sorted in any manner, i.e. branch, note type, officer, etc.?

Sort is not important to us since our tools will sort the data in the manner we need once we import the file.

For Numeric fields, it is stated that negative numbers are not allowed. What is meant by "negative value will be assumed by the field description"?

We meant use no signed integers and no indications of positive or negative values. The numeric fields may only contain numerals, decimal points (where indicated in the Format column), and/or spaces. For example, if there is a balance for a participation sold, we expect to receive the absolute value of whatever is in your system. We understand that we have to net this sold balance against the note's outstanding balance to derive book balance.

However, this question did prompt us to re-evaluate our format where the data housed in a bank system could routinely be positive *or* negative. A good example would be the balance in an escrow account. The new file format allows data in fields 22, 35, 36, 48 and 80 to be preceded by a minus sign when the underlying data is negative. That option is only available for these fields.

Is there a particular method for transmission and data encryption that is expected?

Since, in almost every case, you'll be providing the file to your client bank, data security between your center and the bank is up to you. If we move to web submission of the data at some point in the future, we'll address encryption at that time.

How should we report in field 61 (next payment due) when the loan is delinquent?

Show the due date of the next payment. This will be in the past if the loan is delinquent.

How should we report in field 62 (payment frequency) when the note has a mixed payment structure (for example, interest monthly with principle quarterly)?

This is a 10-character alpha field. Please describe the payment structure as "mixed" or "variable." That would clue the examiner to look a bit more closely.

On a related note, what should we report in field 69 (payment amount) for loans with mixed payments?

Report the amount of the next expected payment if known. If field 62 says "mixed," then the examiner will know this is not a fixed payment.

How should we report negatively amortizing loans in field 68 (amortizing/non-amortizing)?

Answer "no."

What should we report in field 70 (date of last payment) if the last payment wasn't a full payment?

Report the date of the last payment even if it wasn't a full payment. We are looking for activity on the line.

How should we report non-valid dates. In some systems, non-valid dates are used to identify a specific event (i.e., 6-31 for quarter end).

In those cases, please convert to a real date. Report all other non-valid dates as is, since they probably reflect a data integrity problem that the examiner will want to discuss with management.

Should we map overdraft or DDA lines of credit to this file (they are carried in the deposit application)?

No.